

Courtney Devon Taylor (NJ Bar. No. 037022008)

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Counsel for Proposed Intervenor-Defendant

Atlantic Shores Offshore Wind, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SAVE LONG BEACH ISLAND AND ROBERT)	Case No.: 3:23-cv-01886-ZNQ-JBD
STERN,)	Judge Zahid N. Quraishi
)	Magistrate Judge J. Brendan Day
Plaintiffs,)	
v.)	
)	
U.S. DEPARTMENT OF COMMERCE; GINA)	NOTICE OF MOTION TO
RAIMONDO, in her official capacity as Secretary)	INTERVENE AND TO DEFER
of Commerce; NATIONAL MARINE)	FILING ANSWER
FISHERIES SERVICE; and JANET COIT,)	
in her official capacity as Director, National)	Motion Return Day: Jun 5, 2023
Marine Fisheries Service,)	
)	
Defendants.)	
)	

TO: THE CLERK OF THE COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on June 5, 2023, at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Proposed Intervenor-Defendant Atlantic Shores Offshore Wind, LLC (“Atlantic Shores”) will apply to the Honorable Zahid N. Quraishi, United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building

and U.S. Courthouse, 402 East State Street, Room 2020, Trenton, NJ 08608, for entry of an order granting its motion to intervene as of right as a defendant in the above-captioned case pursuant to Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, seeks permissive intervention pursuant to Federal Rule of Civil Procedure 24(b), to protect its interests in the federal approvals challenged in this action. Plaintiffs do not oppose Atlantic Shores' motion to intervene. Federal Defendants take no position on Atlantic Shores' motion to intervene.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Atlantic Shores will rely on this Notice of Motion and the concurrently-filed Memorandum of Law, Declaration of Jennifer Daniels, and all pleadings and other documents filed with the Court in this action. As stated in its Memorandum of Law, Atlantic Shores respectfully requests that the Court permit Atlantic Shores to file its Answer or other responsive pleading pursuant to Federal Rule of Civil Procedure 24(c) and Local Civil Rule 7.1(f)(1) by the same date as Federal Defendants, currently due on June 12, 2023, or three days after intervention is granted, whichever is later.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Atlantic Shores' motion is submitted herewith in accordance with Local Civil Rule 7.1(e).

Respectfully submitted,

/s/ Courtney Devon Taylor
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Dated: May 12, 2023
Philadelphia, Pennsylvania

*Counsel for Proposed Intervenor-Defendant
Atlantic Shores Offshore Wind, LLC*